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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

PALAZZO VINTAGE HOMES, LLC, an
Oregon company,

PLAINTIFF,

v.

**URBAN HOUSING DEVELOPMENT,
LLC**, an Oregon company, **STEWARDSHIP
REALTY, LLC**, an Oregon company, **DEZ
DRAFTING & DESIGN, LLC**, an Oregon
company, **VLADIMIR OZERUGA**, an
individual, **E & O VENTURES, LLC**, an
Oregon Company and **SLAVIK
DEZHNYUK**, an individual,

DEFENDANTS.

Case No. 09-CV-952-JE

**PLAINTIFF'S RESPONSE TO MOTION
FOR PROTECTIVE ORDER
TO LIMITED THIRD-PARTY
DISCOVERY**

Plaintiff hereby responds to Defendants' Motion for a Protective Order as follows. The issues raised in Defendants' motion were addressed during the teleconference the parties held with the Court on April 23, 2010. This Court entered the following transaction on the same day:

Third-Party Subpoena: Plaintiff's attorneys may receive the documents from Z-St Design and secure them, without reviewing, until Ms. Taylor is present. At that time, all counsel shall review the documents and, if there are objections to any documents, counsel to contact the court.

Plaintiff has secured the documents from the third party and, pursuant to the Court's order, has not yet reviewed them. Mr. Heuser (counsel for Plaintiff) has invited Ms. Taylor (Counsel for Defendants other than Slavik Dezhnyuk and DEZ Drafting and Design) to come review the documents on multiple occasions, but Ms. Taylor has indicated she has been too busy to do so. Plaintiff is hopeful Ms. Taylor will be able to review the documents with Mr. Heuser during the next two days, as they are going to be together in depositions during that period, so that additional Court intervention can be avoided.

Respectfully submitted,

By /s/ Peter Heuser
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Of Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of PLAINTIFF'S RESPONSE TO MOTION FOR PROTECTIVE ORDER TO LIMITED THIRD-PARTY DISCOVERY was served upon the following, and in the manner, as listed below:

Laura Taylor
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Defendant

by electronic and first-class mail

*Of Attorneys for Defendants Urban Housing
Development, Stewardship Realty, Vladimir
Ozeruga and E & O Ventures*

by electronic and first-class mail

on May 10, 2010.

/s/ Peter Heuser
Peter E. Heuser, OSB No. 811281

Of Attorneys for Plaintiff